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*Counsel for Lead Plaintiff Bradley Sostack and the Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

In re RIPPLE LABS, INC. LITIGATION

Case No. 4:18-cv-06753-PJH

CLASS ACTION

This Document Relates To:

All Actions

**DECLARATION OF JAMES TAYLOR-  
COPELAND IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION TO EXCLUDE  
THE TESTIMONY OF JEREMY CLARK**

**REDACTED**

1 I, James Taylor-Copeland, hereby declare as follows:

2 1. I am a member in good standing of the bar of the State of California, and counsel of  
3 record for Lead Plaintiff Bradley Sostack and the Class. I have personal knowledge of the facts set  
4 forth herein, and if called as a witness, would testify competently thereto.

5 2. I make this declaration in support of Lead Plaintiff's Opposition to Defendants' Motion  
6 to Exclude The Testimony of Jeremy Clark.

7 3. Attached as Exhibit 1 is a true and correct copy of the June 7, 2023 Expert Report of  
8 Jeremy Clark, Ph.D, P.Eng.

9 4. Attached as Exhibit 2 is a true and correct copy of the August 8, 2023 Expert Rebuttal  
10 Report of Jeremy Clark, Ph.D., P.Eng.

11 5. Attached as Exhibit 3 is a true and correct copy of excerpts of the October 20, 2023  
12 Deposition Transcript of Dr. Jeremy Clark.

13 6. Attached as Exhibit 4 is a true and correct copy of a document titled "A Fundamental  
14 Valuation Framework for Cryptoassets," authored by Robert Mitchnick and Susan Athey in June 2018,  
15 produced in this matter at bates number RPLI\_00896976.

16 7. Attached as Exhibit 5 is a true and correct copy of excerpts of the June 9, 2021  
17 Deposition Transcript of Dinuka Samarasinghe, from *SEC v. Ripple Labs Inc.*, Case No. 20-civ-  
18 10832(AT)(SN).

19 8. Attached as Exhibit 6 is a true and correct copy of excerpts of the May 26, 2021  
20 Deposition Transcript of David Schwartz, from *SEC v. Ripple Labs Inc.*, Case No. 20-civ-  
21 10832(AT)(SN).

22 9. Attached as Exhibit 7 is a true and correct copy of excerpts of the March 16, 2023  
23 Deposition Transcript of David Schwartz, from this Case No. 4:18-cv-06753-PJH.

24 10. Attached as Exhibit 8 is a true and correct copy of a document titled [REDACTED]  
25 [REDACTED], produced in this matter at bates number RPLI\_00736646.

26 11. Attached as Exhibit 9 is a true and correct copy of an email chain ending on February  
27 19, 2021 from Sara Mansur to Bharath Chari, produced in this matter at bates number RPLI\_02424182.

12. Attached as Exhibit 10 is a true and correct copy of a [REDACTED]  
[REDACTED], produced in this matter at bates number  
RPLI 03680716.

13. Attached as Exhibit 11 is a true and correct copy of an email chain ending with a July 21, 2020 email from wietse@crpl-labs.com to Ethan Beard and Jimmy Chang, produced in this matter at bates number RPLI\_00544221.

14. Attached as Exhibit 12 is a true and correct copy of excerpts of the October 16, 2023 Deposition Transcript of Dr. Allen Ferrell.

15. Attached as Exhibit 13 is a true and correct copy of excerpts of the March 29, 2023 Deposition Transcript of Jed McCaleb.

16. Attached as Exhibit 14 is a true and correct copy of Defendants' March 31, 2023 First Amended Initial Disclosures.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 8th day of March, 2024, at San Diego, California.

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